



JOHN BRIEDEN

County Judge

December 1, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: WC Docket No. 12-375 Second Further Notice of Proposed Rulemaking (Inmate Calling Services)

Dear Ms. Dortch,

Our local government is in support of reasonable inmate calling rate and fee reforms and appreciates the efforts of the FCC to protect inmates and their families from paying excessive rates, fees and third-party billed products. Of concern to us, however, is that is only one side of the story. The local governments running jails must offer the subscribed services, but at what cost? Below are just a few of the costs we incur in offering inmate phone services to our inmates:

- Maintaining phones and monitoring maintenance of phones
- Handling US Marshal inquiries regarding contract inmate phone calls, compliance and reporting
- Bandwidth costs for offering and administering inmate phone platform.
- Storing of calls that are used for court
- Live alert transmission costs to call investigator
- Three-way call detection verification by staff
- Prosecuting or disciplining inmates for crimes committed while using the inmate phones and visitation phones
- Visitation phones (use the same recording and security features as the inmate phones)
- Indigent calling
- Free calls to public defenders, consulates, embassies and private counsel, ombudsmen
- Free calls to bail bond companies
- Free calls to facility commissary providers for ordering
- Free booking calls
- Bonding/holding phones
- Prison Rape Elimination Act (PREA) mandated voicemail systems, handling calls and reporting
- Customer service feature for inmates to report phone problems and grievances.

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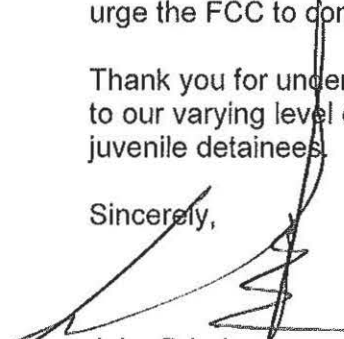
- Free inmate voice mail broadcast from facility staff and approved contact list
- Cell phone detection and interception systems
- Free customer service system for inmates – lightens workload of facilities staff
- Transporting inmates to phones and visitation phones
- Listening to calls. After implementing caps on rates, fees and single-payment products, inmate calling will most likely double resulting in doubling the costs of listening to calls and managing inmate calling privileges.
- Providing call recordings to court
- Writing Requests for proposals and handling the bidding process
- Learning how to use the inmate phone system and the myriad of security features
- Litigation resulting from inmates or the public regarding use of the phone system

We would like to make mention that local governments struggle under the unfunded mandates continually required from above. When a regulation is published or a new program started that require services by the local government without the accompanying funding or source of funding it compromises other needs our constituency demands from us. Commission payments are a vital part of our ability to provide the telephone services to inmates.

We are aware of recent rules implemented in the state of Alabama that require reasonable rates and funding fees, but also allow for continued payment of commissions to jails and prisons. We urge the FCC to consider mirroring the overall regulation implemented in that state.

Thank you for understanding our concerns and complexities involved in offering phone services to our varying level of inmates...maximum security, medium and low level security and our juvenile detainees.

Sincerely,



John Brieden
County Judge